

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)**

IN RE:)	
)	
WARFIELD HISTORIC PROPERTIES, LLC, <i>et al.</i>,)	Case Nos. 24-12500; 24-12506; 24-12504 24-12508; 24-12511
)	
Debtors.)	(Jointly Administered Under Case No. 24-12500) Chapter 11
)	

* * * * *

**JOINT MOTION FOR CONTINUANCE OF HEARING ON
DEBTORS' MOTION TO SELL REAL PROPERTY AND MOTIONS TO REJECT
REVERSION AGREEMENT AND PARCEL D PRESERVATION AGREEMENT**

Warfield Center, LLC, Warfield Historic Properties, LLC and Warfield Historic Quad, LLC (collectively, the “Debtors”) and The Town of Sykesville (“Town”), by and through their undersigned counsel, hereby move this Court to continue the hearing scheduled for June 10, 2024. In support of this motion, the Debtor and the Town state as follows:

1. Warfield Center, LLC filed a Motion for Order Approving Sale of Real Property Free and Clear of all Liens, Claims, Interests and Encumbrances Pursuant to 11 U.S.C. § 363(b) and (f) (the “Sale Motion”) (Docket # 44).
2. The Town filed an objection to the Motion (the “Sale Objection”) (Docket # 57).
3. Warfield Historic Properties, LLC and Warfield Historic Quad, LLC filed a Motion for an Order Approving and Authorizing Rejection of Reversion Agreement (the “Reversion Motion”) (Docket # 43).
4. The Town filed an objection to the Motion (the “Reversion Objection”) (Docket # 52).

5. Warfield Historic Properties, LLC and Warfield Historic Quad, LLC filed a Motion for an Order Approving and Authorizing Rejection of Parcel D Preservation Agreement with the Town of Sykesville (the “Preservation Motion”) (Docket # 42).

6. The Town filed an objection to the Preservation Motion (the “Preservation Objection”) (Docket # 53).

7. The Court has scheduled a hearing on the Sale Motion, the Reversion Motion, the Preservation Motion and Objections thereto for June 10, 2024 at 10:00 a.m. (the “Hearing”).

8. The debtors in the above-captioned cases and the Town agreed to seek a global resolution of all matters in dispute through alternative dispute resolution and have now agreed upon a mediator.

9. After multiple communications regarding scheduling (there are many individual attendees involved on both sides), the parties have agreed upon Judge James Eyler as the mediator¹.

10. The mediation is scheduled to commence on July 23, 2024.

11. Accordingly, the Debtor and the Town request that this Court continue the Hearing on the three Motions until the first available date around August 1, 2024.

12. The Debtor and the Town further agree that the Debtor may file replies to the each of the Motions up to five (5) days before the date of the Hearing.

¹ If required by this Court, the parties will seek authority to retain Judge Eyler as the mediator. The understanding is that the parties will share payment of the mediation fee equally.

WHEREFORE, the Debtors and the Town respectfully request that this Court continue the Hearing until a date around August 1, 2024 and grant such other relief as is just and proper under the circumstances.

Respectfully submitted,

SHULMAN ROGERS, P.A.

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on the 3rd day of June, 2024 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the **Joint Motion for Continuance of Hearing On Debtors' Motion to Sell Real Property and Proposed Order** were served electronically by the Court's CM/ECF system on the following:

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I **FURTHER HEREBY CERTIFY** that copies of the foregoing **Joint Motion for a Continuance on Debtor's Motion to Sell Real Property and Proposed Order** were mailed, postage prepaid this 3rd day of June, 2024

20 Largest Unsecured Creditors on the attached List

Respectfully submitted,

SHULMAN ROGERS, P.A.

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